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11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**
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14 CHARLENE BYNUM individually, as the
wife of RONALD BYNUM and as the
15 Guardian of the Person and Estate of
RONALD BYNUM,

16 Plaintiff,

17 vs.

18 CITY OF NORTH LAS VEGAS; JACOB
RAY (P#1886); RODRIGO DELARA
19 (P#2417); JOHN E TONRY (P#1684); JESSE
20 LEE CESENA (P#2425); ALEXANDER
21 PEREZ; JEFFREY K. LYTLE; YAPHET
22 MILLER; JOHN LANSING; SCOTT
23 NIELSEN; STEVEN MCKLEIN CITY OF
LAS VEGAS; MICHELLE FREEDMAN;
24 CITY OF LAS VEGAS CORRECTIONAL
OFFICERS: ALGIN BROOKS, ANGEL
25 JONES, ASHWORTH, CORY PRICE,
DANIELLE STONE, GABRIELLE ABBOT,
26 JASON JONES, JENNIFER BRADFORD,
JOSHUA LOPER, JULIO OLARTE,
27 KATHLEEN HENLEY, L. HENDERSON,
LANDROVE, LEIGH MANN, LORIN

Case No.: 2:17-cv-02102-APG-VCF

Case No.: 2:18-cv-00354-MMD-CWF

**STIPULATION and ORDER TO
CONSOLIDATE**

SMITH, M. SZOSTEK, MARCOS PARKER,
MICHAEL DARREN, MILETTE JONES,
OFFICER CREAGER, OFFICER
EDWARDS, OFFICER JERNEE, OFFICER
KAHELE, OFFICER KATZ, OFFICER
MANRA, OFFICER MARKITZ, OFFICER
ROGERS, RAMON BROOKINS, ROBERT
MORRIS, S. MARTINEZ, Sergeant B.
GRIFFITH, Sergeant KELLEHER,
SERGEANT ALVIN KENON, Sergeant
LARRY GRAVES, SCOTT EDWARDS,
STEVE CHESNEY, TRAVIS ROZ, WESLEY
STONE, SERGEANT DENT, CESAR
LANDROVE; CORRECT CARE
SOLUTIONS, LLC, a purported Kansas
Limited Liability Company, Correct Care
Solutions Nurses: CN HAPLIN, CHARGE
NURSE, NOREEN EVANS, NURSE
ANDERSON, NURSE AVEN, NURSE
DARDEN, FRANCESCA NOCE, NURSE
NARE, NURSE NOCE, CHRISTOPHER
NEHLS, HAYDEE. TOLENTINO,
JENNIFER SWAN, CHRISTINA SCHADE,
BARBARA BUTTINO CORRECT CARE
MANAGERS 1-10; CORRECT CARE
EMPLOYEES 1-10; CORRECT CARE MD
OR DO'S 1-5, MEDICAL DIRECTOR'S 1-5
DOES 1-100 and DOE ENTITIES 1-10.

Defendants.

STIPULATION AND ORDER TO CONSOLIDATE

Plaintiff Charlene Bynum, by and through his counsel of record, The Law Office of Dan M. Winder, P.C. and Defendant City of North Las Vegas and Defendant City of Las Vegas et al., by and through its counsel of record, Lewis Brisbois Bisgaard & Smith LLP and Las Vegas City Attorneys Office hereby stipulate and agree to the consolidation of Plaintiff Charlene Bynum's two civil cases against Defendant City of North Las Vegas et al. (Case No. 2:17-cv-02102-APG-VCF) ("first case") and Case No. 2:18-cv-00354-MMD-CW ("second case"). The parties agree

1 that common questions of law and fact are present in the two cases, judicial economy would be
2 served with consolidation, and Defendant will not suffer prejudice due to consolidation.

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4 1. The parties further stipulate and agree that this Honorable Court has subject
5 matter jurisdiction. This action is authorized and instituted pursuant 42 U.S.C. §1983.
6 .Jurisdiction is found upon federal question jurisdiction under 28 USC 1331 as this case is a civil
7 action arising under the Constitution and Laws of the United States, particularly the Fourteenth
8 Amendment (due process) and the Eighth Amendment.

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10 2. PLAINTIFF CHARLENE BYNUM alleges, on information and belief, the North
11 Las Vegas Police, under circumstances where they knew her husband Ronald Bynum required
12 medical attention, threw her husband Ronald Bynum to the ground, beat him, and stunned him,
13 that they, along with the North Las Vegas Ambulance crew, denied him medical treatment and
14 took him to the City of Las Vegas Jail. While there, the jailers failed to allow him treatment for
15 his worsening medical condition, beat him and let him suffer a cardiac arrest. The jailers
16 resuscitated him and sent him to Sunrise Hospital in a coma. Ronald Bynum remains in a coma
17 to this day.
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1 This stipulation is entered into in good faith and not for the purpose of any undue delay.

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3 Dated this 5th day of March, 2018.

4
5 Law Office of Dan M. Winder, P.C.

Lewis Brisbois Bisgaard & Smith LLP

6 /s/ Dan M. Winder
7 DAN M. WINDER, ESQ.
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16 Las Vegas City Attorney

17 /s/ John A. Curtas
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26 *Attorneys for Defendants*

27
28 **ORDER**

IT IS SO ORDERED.

Dated this 6th day of March, 2018


UNITED STATES MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE**

2 Pursuant to FRCP 5, LR IC 4-1, and LR 5-1, I hereby certify that I am an employee of the
3 LAW OFFICE OF DAN M. WINDER, P.C., and that on the 5th day of March, 2018, I served
4 the foregoing **STIPULATION AND ORDER TO CONSOLIDATE PLAINTIFF'S TWO**
5 **CASES AGAINST DEFENDANT CITY OF NORTH LAS VEGAS ET AL.** on counsel as
6 follows:

7
8 This Honorable Court's CM/ECF System:

9
10 City of Las Vegas and Michele Freeman
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Attorneys for Defendants

29
30 /s/ James R. Winder

Employee of the Law Office of Dan M. Winder P.C.